

Communications and Record Keeping

Agenda

Communications and Record Keeping

- Overview
- Competitive Bidding (470 & Contracts)
- SLD Communications
- PIA
- Item 25 Certification Review
- Selective Review
- SLD/FCC Appeals
- E-Rate Audits

Overview

- Start a binder/file NOW!
- Document everything
- Send everything with proof of delivery
- Pay close attention to all dates and timelines
- Remember that someone else might need to use your documentation
- Save all documentation for 5 years

Competitive Bidding (1)

- SLD website posting does NOT substitute for proper procurement procedures
- Set-up a calendar to track 471 Window
- Make sure that you have all necessary signatures and/or board approvals
- Do not sign/award contracts within 28 days of posting 470
- Per SLD rules you must "consider" all responses to 470 posting

Competitive Bidding (2)

- Vendors may not have improper involvement in Form 470/bidding process
 - Signing the Form 470
 - Acting as the point of contact on the Form 470
 - Receiving proposals
 - Evaluating proposals
 - Controlling information flowing from the applicant to other service providers

Competitive Bidding (3)

- Other Cautions
 - Service Providers may not:
 - ♦ “waive” the school’s match
 - ♦ Fill out program forms for applicants that require certification
 - Consultants may not fill out program forms without express authorization

SLD Communications (1)

- 470 Receipt Notification Letter
 - Check for Allowable Contract Date
 - Check to be sure that certification has been sent
 - Reminder to include E-Rate contingencies in contracts

SLD Communications (2)

- 471 Receipt Acknowledgement Letter(1)
 - Limited Modifications permitted
 - Changes must be made within 2 weeks of mailing
 - Photocopy letter, cross out erroneous information, send back to SLD get receipt of delivery
 - No notification that SLD received or made changes

SLD Communications (3)

- 471 Receipt Acknowledgement Letter (2)
 - Permitted Modifications
 - Block 1 corrections/updates
 - Data entry corrections
 - Deletions or reductions (not increases) in Funding Request Numbers (FRNs)
 - SPIN corrections
 - Unbundling FRNs to 2 or more service providers

SLD Communications (4)

- Funding Commitment Decision Letter
 - Issued in waves
 - Provides detailed information for each FRN
 - 1 of 3 Basic Decisions
 - ◆ Funded
 - ◆ Not Funded
 - ◆ As yet unfunded

SLD Communications (5)

- 486 Notification Letter
 - NEW – CIPA Certification timeline
 - SLD will not process invoices/BEAR without 486
- 472 (BEAR) Notification Letter
 - Service provider will receive payment within 14-20 days

SLD Communications (6)

- Appeals Funding Commitment Decision Letter
 - Issued in response to successful appeal
 - Indicates new Funding Commitment
- Form 500 Notification Letter
 - Indicates changes that were made to FRN based on Form 500 submitted
 - ◆ Contract date, funding commitment, etc.

SLD Communications (7)

- Commitment Adjustment Letter
 - Corrects an error that was sent on a Funding Commitment Decision Letter (could be SLDs own error)
 - Indicates new Funding Commitment

Program Integrity Assurance (1)

- PIA stands for Program Integrity Assurance
- Designed to validate that an application is in compliance with the program rules
- Most information can be sent via e-mail/FAX
- Save copies of everything that you send and proof that it was sent

PIA Validates

- Eligibility of entities
 - ♦ Letter from CDE or letter of accreditation
- Appropriateness of discounts
 - ♦ NSLP report or survey summary
- Eligibility of Services
 - ♦ Products, list of equipment covered by maintenance, copies of bills from prior year(s), quotes, itemized 1-time costs, master contract #(s) and expiration date(s), # of telephone lines and/or cell with usage if for other than educational

PIA Validates

- Services delivered during funding year
 - Can not be "reimbursed" for services delivered in prior years. Never accept delivery prior to start of program year
- Proper 470/471 posting
 - Check 470 RNL for Allowable Contract Date
 - 470 and 471 must agree on service category, scope of work, term of contract
 - Make sure that you enter correct 470 number on your 471
- Presence of Contract

Top PIA Denial Reasons (1)

- 28 day rule violation - May NOT select vendor, sign contract, sign or submit 471 within 28 days of posting 470 (look at 470 RNL) 470 not posted for service type (e.g., telecom requested on 471 but not on 470)
- 470 not filed for new services requested (e.g., new service ISDN on 471 but no ISDN on 470)
- Ineligible services \geq 30% of funding request
 - e.g. \$1,000.00 PBX includes \$300.00 in telephones

Top PIA Denial Reasons (2)

- No response to request for additional information within 7 days (e.g., usually after multiple attempts to contact the applicant, SLD faxed request for manufacturer, model number, description, and function of server but school never responded to request)
- No technology plan in place
- Discount % below internal connections funding threshold (e.g. school eligible for 60% discount but SLD only funding to 85%)

Item 25 Certification Review (1)

- Designed to verify that you have the resources (matching funds and technology) in place to use services for which discounts have been requested
- Covers all Form 471 applications for an entity for a single funding year
- Certification package includes a "Fax Back" worksheet.
- You must respond within 7-days (fax request if you need an extension)

Item 25 Certification Review (2)

- Ability to pay match
 - Budget pages or board resolution
- Technology Plan
- Fax Back package
 - Worksheet (6 sections + Technology Implementation Level)
 - Resource Plan
 - E-Rate Implementation Description

Item 25 Certification Review (3)

Fax Back Page 1 (Worksheet)

- Section I - Connectivity
 - ◆ Document for Telecom, Internet Access, and Internal Connections
 - Amount of E-Rate support requested (pre-filled)
 - Amount of Matching funds for E-Rate
 - Amount spent that is not eligible for E-Rate

Item 25 Certification Review (4)

Fax Back Page 1 (Worksheet)

- Section II - Hardware
 - Document or estimate for prior fiscal year and estimate for E-rate funding year
 - ◆ # of computers with Internet Access
 - ◆ Total \$ spent on hardware (both eligible and ineligible)
 - ◆ Total \$ value of donations for hardware (both eligible and ineligible)

Item 25 Certification Review (5)

Fax Back Page 1 (Worksheet)

- Section III – Professional Development
 - Document or estimate for prior fiscal year and estimate for E-Rate funding year
 - ◆ Percentage of staff receiving training for certain # of hours – 0-5hrs, 5-15hrs, 15-25hrs, 25-50hrs, and 50 or more hrs
 - ◆ Total \$ spent on tech staff development
 - ◆ Total \$ value of donations for technology staff development

Item 25 Certification Review (6)

Fax Back Page 1 (Worksheet)

- Section IV – Software
 - ◆ Document or estimate for prior year and estimate for E-rate funding year
 - Total \$ spent on software
 - Total \$ value of software donations
- Section V – Retrofitting
 - ◆ Document or estimate for prior year and estimate for E-Rate funding year
 - Total \$ spent on retrofitting
 - Total \$ value of retrofitting donations

Item 25 Certification Review (7)

Fax Back Page 1 (Worksheet)

- Section VI – Maintenance
 - ◆ Document or estimate for prior year and estimate for E-rate funding year
 - Total \$ spent on maintenance
 - Total \$ value of maintenance donations
- Technology Level Implementation
 - ◆ Number of schools at 1 of 4 levels of technology Implementation

Item 25 Certification Review (8)

- Fax Back Page 2 (Resource Plan)
 - Narrative describing the plan to obtain resources necessary to effectively use E-Rate resources
- Fax Back Page 3 (Resource Plan)
 - Narrative describing the plan to implement the E-rate requests for funding year

Selective Review (1)

- Reviews competitive bidding and ability to pay match
- Must respond within 7-days (FAX request if you need more time)
- Mostly requests copies of documents
- Some duplication of information requested in Item 25 Certification Review

Selective Review (2)

- Send copies of
 - All contracts relating to E-Rate services
 - All RFPs, etc. for services listed on 471
 - Copies of all bids received from vendors responding to E-rate requests
- Explain process for selecting vendor(s)
- Document ability to pay for E-rate match

SLD/FCC Appeals (1)

- Must be within 30 days of date of decision (date of letter)
- Can not appeal to both simultaneously
 - Either appeal to SLD first then FCC or skip SLD and go directly to FCC
 - SLD can not consider if already appealed to FCC
 - FCC will not consider any appeal if it is currently under appeal to SLD

SLD/FCC Appeals (2)

- SLD Appeal
 - Simply write a letter and state your case
- FCC Appeal (1)
 - Has required format
 - ◆ Captioned "In the matter of: Request for Review by [name of party seeking review] of Decision of Universal Service Administrator" and shall reference FCC Docket Nos. 97-21 and 96-45.

SLD/FCC Appeals (3)

- FCC Appeal (2)
 - ◆ State party's interest in the matter
 - ◆ Full statement of relevant material facts with supporting affidavits and documentation
 - ◆ The question presented for review with reference to appropriate FCC rules, orders, or statutes
 - ◆ State the relief sought
- Consider Legal Counsel

E-Rate Audits

- SLD conducts both random and "not random" audits
- Auditor might be SLD or private contractor
- Looking for documentation
 - Technology Plans
 - Purchase Orders, Invoices, Cancelled checks, etc.
 - Contracts
- Schools must retain records for 5 years

Summary

- None of these are fun but they are a part of E-Rate program
- Proper documentation and record keeping will make the process easier
- Even if you do everything properly, without documentation you risk losing (or having to repay) E-Rate funding
- Remember, responsibility for E-Rate within a District changes from time to time - make your record keeping clear and thorough